

EXHIBIT 14

OPTUM/DOL

1.) Any disclosures to plan sponsors

The Following language is from our annual disclosure to plan sponsors, the language below is from the 2016 disclosure. This language was provided to plan sponsors in November and December of 2016.

Under some network vendor relationships, the vendor is responsible for contracting with the providers who perform the health care services, and potentially also for some other services related to those providers such as claims processing, credentialing, and utilization management. Under some of these arrangements, the vendor bills Aetna directly for those services its network of providers, at the vendor's contracted rate with Aetna, and Aetna pays the vendor for those services. In some cases, the amount billed by the vendor to Aetna, paid by the plan, includes an administrative fee for any delegated services by the vendor. As a result, the amount the vendor pays to the health care provider through the vendor's contract with the provider may be different than the amount paid by the plan because the allowed amount under the plan will be Aetna's contracted rate with the vendor, and not the contracted amount between the vendor and the health care provider.

2.) Any language that was in SPD or ASO Agreement describing the process

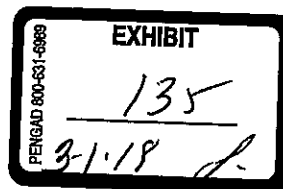
ASO

This specific language was used for MSAs issued beginning in Nov/Dec 2015.

Aetna may contract with vendors who in turn are responsible for contracting with the providers who perform the health care services, and potentially for certain other services related to those providers such as claims processing, credentialing, and utilization management. Under some of these arrangements, the vendor bills Aetna directly for those services by its network of providers at the vendor's contracted rate with Aetna, and Aetna pays the vendor for those services. In certain cases, the amount billed by the vendor to Aetna, paid pursuant to the plan, includes an administrative fee for delegated services by the vendor. As a result, the amount the vendor pays to the health care provider through the vendor's contract with the provider may be different than the amount paid pursuant to the Plan because the allowed amount under the Plan will be Aetna's contracted rate with the vendor, and not the contracted amount between the vendor and the health care provider

SPD's

The language below is the language that was developed to include in our insured plan documents and would be the language suggested to plan sponsors for their SPD's (since many self-funded plans write their own SPD language). Small group and individual language will be present in forms supporting 2018



products (forms reissue every year). Large group are being added to policies as state approves (to be done through project).

Negotiated charge

as to health coverage, (other than prescription drug coverage for services obtained from a network pharmacy):

Either (1) The amount a [select care and] [network] provider has agreed in its contract with Aetna to accept for rendering services or providing prescription drugs or supplies to members of your plan; or (2) The amount Aetna has agreed to pay directly to the [select care and] [network] provider or to a third party vendor (including any administrative fee that may be included in the amount paid) for the services, provision of prescription drugs or supplies.

REDACTED - NOT RESPONSIVE

4.) Explanation of the information on the member EOB

Aetna holds a contract with Optum. That contract provides for negotiated rates that are paid to Optum for particular services (see item for Optum Compensation schedule below).

Optum is responsible for Credentialing, Utilization Management and payment of the Chiropractic providers.

Optum holds contracts with the individual Chiropractic providers who are providing the services.

Optum pays the individual Chiropractors based on the individual contracts those providers hold with Optum.

Optum bills Aetna for the services and Aetna reimburses Optum based on the rates in the contract between Aetna and Optum. Example of EOB That shows 70.89 billed and allowed amounts on our EOB, for code 98941, which line up with the amounts for the code 98941 on the Optum fee schedule in effect at the time services were delivered.

The rate reflected as the negotiated rate on the EOB is reflective of the rate paid to Optum for all of the services delivered under the contract.

The agreement with Optum can provide significant cost savings for the customer and member when viewed in total. The relationship also provides savings on the services included over what the costs would be if Aetna negotiated and held all of the individual contracts with the providers. However, that savings may not be apparent on any one claim.

- 5.) **Provide the Department of Labor with the full Compensation Schedule (Chiropractic) for the Optum Agreement.**